AUTHORIZATION TO ACT ON BEHALF OF THE ASSIGNEE

UNDER 37 CFR 3.73(b)(2)(i)

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Sir:

The practitioners associated with Customer Number 98804 have been authorized (or empowered) to act on behalf of ContentGuard Holdings, Inc. before the United States Patent and Trademark Office (i.e. to sign the enclosed submission on behalf of the assignee), pursuant to 37 CFR 3.73(b)(2)(i).

If any additional information is required in this regard, please contact the undersigned as soon as possible.

Respectfully submitted,

Date: September 16, 2010

/Stephen M. Hertzler, Reg. No. 58,247/ Stephen M. Hertzler Registration No. 58,247

REED SMITH LLP

CUSTOMER NO.: 98804 1301 K Street N.W. Suite 1100 – East Tower Washington, D.C. 20005